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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ; DOES I  
THROUGH X; AND ROE  
CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**SECOND AMENDED  
JOINT PRETRIAL ORDER**

COMES NOW Plaintiff, SONALOLITA WILSON (“Plaintiff” or “Wilson”), by and through her attorneys, BRADLEY S. MAINOR, ESQ., and ASH MARIE BLACKBURN, ESQ., of MAINOR WIRTH LLP; and Defendants UNITED STATES OF AMERICA, LLC (“USA”), by and through their attorneys, R. THOMAS COLONNA, ESQ., for the UNITED STATES ATTORNEY, and submit this [Proposed] Amended Joint Pretrial Order pursuant to LR 16-3.

**I.**

**A. Summary of Action**

This is a personal injury action arising out of two motor vehicle collisions that occurred on September 1, 2016, between Plaintiff WILSON and Defendant USA and Plaintiff WILSON and DEMHA-SANTIAGO and DEMHA. Plaintiff was traveling eastbound on Washington Avenue, approaching Saylor Avenue, in the eastbound lanes. Plaintiff alleges Nakia McCloud, while in the course and scope of her employment with Defendant USA, in its Department of the Treasury, IRS,

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1 was also traveling eastbound on Washington Avenue, directly behind Plaintiff.

2 Plaintiff alleges to have stopped in the eastbound travel lane for pedestrians who were  
3 crossing Washington Avenue. Plaintiff avers that Nakia McCloud then rear-ended Plaintiff's  
4 vehicle.

5 Following the first collision, Nakia McCloud pulled her vehicle off to the right side of the  
6 road. Plaintiff's vehicle remained in the roadway. As Nakia McCloud was on the phone with  
7 emergency services, while Plaintiff sat in her disabled car, her vehicle was struck again by a  
8 different vehicle, driven by a dismissed party, DEMHA SANTIAGO. Plaintiff further contends she  
9 was injured as a result of the September 1, 2016 motor vehicle collisions.

10 **B. Relief Sought**

11 Plaintiff seeks past medical specials in an amount in excess of \$1,720,662.65. Plaintiff is  
12 continuing her medical treatment. She is also seeking the present-day value of future medical  
13 expenses in the amount of \$386,938.00, loss of earning capacity in the amount of \$805,038.85, and  
14 past and future pain and suffering.

15 Plaintiff presented claims for future medical specials between \$1,504,780.00 and  
16 \$2,238,876.00 during discovery. Thereafter, Defendant USA filed a Motion to Strike Untimely  
17 Disclosure of Plaintiff's Expert's Life Care Plan Opinions, which was granted by the Court.

18 **C. Contentions of the Parties**

19 **1. Plaintiff's Contentions:**

20 Plaintiff contends that Defendants were the sole cause of the subject collisions by failing to  
21 pay full attention to their surroundings, failing to reduce their speed, and striking the rear of  
22 Plaintiff's vehicle. Plaintiff further contends that the motor vehicle collisions caused her significant  
23 injuries and the resulting damages that are the subject of this lawsuit.

24 **2. Defendant USA's Contentions:**

25 Defendant USA contends that Plaintiff cannot establish her burden of proof as to causation  
26 or damages (if any) as to the USA in the first accident.  
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**II.****Statement of Jurisdiction**

As against the United States, this Court has exclusive jurisdiction pursuant to 28 U.S.C. §1346(b)(1), which provides that federal courts “shall have exclusive jurisdiction of civil actions on claims against the United States... for injury or loss of property, or personal injury or death caused by the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment, under circumstances where the United States, if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred.”

**III.****The following facts are admitted by the parties and require no proof:**

1. Nakia McCloud was an employee of the Department of the Treasury, IRS, on September 1, 2016 and she was acting within the course and scope of her employment with the United States at the time of the motor vehicle accident.
2. On September 1, 2016, Plaintiff WILSON was operating a 2005 Toyota Corolla, traveling eastbound on Washington Avenue, approaching Saylor Avenue, in Las Vegas, Nevada.
3. On September 1, 2016, Nakia McCloud was operating a General Motors Terrain SLE, traveling eastbound on Washington Avenue.
4. On September 1, 2016, a dismissed party, DEMHA-SANTIAGO, was operating a 2006 Acura 3.2 TL, traveling eastbound on Washington Avenue.
5. The vehicle operated by DEMHA-SANTIAGO was owned by another dismissed party, DEMHA.
6. The front of Nakia McCloud’s vehicle collided with the rear of Plaintiff WILSON’s vehicle.
7. The front of DEMHA-SANTIAGO’s vehicle collided with the rear of Plaintiff WILSON’s vehicle.

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8. The collision between DEMHA-SANTIAGO and Plaintiff did not occur until after McCloud's vehicle collided with the Plaintiff's vehicle.

#### IV.

**The following facts, though not admitted, will not be contested at trial by evidence to the contrary:**

None.

#### V.

**The following are Plaintiff's issues of fact to be tried and determined at trial:**

1. Whether Nakia McCloud was negligent in her failure to operate her vehicle in a safe and reasonable manner at the time of the incident.
2. Whether Defendant USA is liable for Plaintiff's injuries in light of Nakia McCloud's breach of duty.
3. Whether Plaintiff could have reasonably been expected to avoid the second collision pursuant to the Court's Order (ECF 113). (Plaintiff disputes USA's ability to argue this issue given its failure to assert a comparative negligence claim or to apportion Plaintiff's damages between the two accidents, as well as the dismissal of the DEMHA Defendants. Thus, this may be a moot point at the time of trial.)
4. Whether the subject collisions proximately caused injuries to Plaintiff.
5. Whether the subject collisions proximately caused damages to Plaintiff.
6. Whether the medical treatment claimed was/is reasonable, necessary, and related to the alleged collisions.
7. Whether the Plaintiff will have future symptoms related to the alleged collisions.
8. Whether the Plaintiff will incur future treatments related to the alleged collisions.
9. Whether the Plaintiff suffered a loss of earning capacity related to the alleged collisions.
10. Whether the Plaintiff has mitigated her damages that she relates to the alleged collisions.

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11. The monetary value of Plaintiff's damages, including pain and suffering, if any.

**The following are Defendant USA's issues of fact to be tried / determined at trial.**

1. Whether Plaintiff's conduct, specifically failing to put on hazard lights, failing to move vehicle off the travel lane, failing to move off to the side of the road and wait for emergency services, and exiting and re-entry in her own vehicle, contributed to her alleged injuries in this case?
2. Whether the United States is liable to Plaintiff and if so, to what extent.
3. Whether, and to what extent, Plaintiff was injured as a result of both accidents on September 1, 2016?
4. Whether and the extent to which Plaintiff was injured as a result of the first accident involving the United States' employee.
5. Whether Plaintiff or any other party's negligence contributed to the accidents and/or Plaintiff's injuries.
6. Whether, and to what extent, the medical treatment Plaintiff received was reasonable and necessary due to the accidents on September 1, 2016?

**VI.**

(a) The following exhibits are stipulated into evidence and intended to be admitted:

See "**Exhibit A**" of this document.

(b) The parties agree the following exhibits will be available for use at the time of trial and the parties agree to their foundation and authenticity, but are not currently intended to be admitted:

See "**Exhibit A-1**" of this document.

(c) The following exhibits are offered by Plaintiff:

See "**Exhibit B**" of this document.

Plaintiff reserves the right to use any documents disclosed by Defendants, including those which experts have reviewed and formed opinions, such as reports; pleadings; correspondence; notes and medical records and billing.

Plaintiff may use any and all writings, published works, journals, treatises, medical texts,

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1 affidavits, films, drawings, graphs, charts, photographs, reports, computer tapes, computer discs,  
 2 and other data compilations, and other medical reference materials which Plaintiff and/or Plaintiff's  
 3 expert(s) use in support of Plaintiff's allegations. By disclosing documents, Plaintiff does not waive  
 4 the right to challenge and exclude documents, or portions thereof, on any basis.

5 Plaintiff may offer documents needed for rebuttal or impeachment purposes, including, but  
 6 not limited to, discovery obtained during the course of litigation as permitted; pleadings; and other  
 7 documentation in accordance with admissible evidence. There may be additional exhibits which  
 8 Plaintiff may wish to offer at the time of trial, not listed above. When and if that determination is  
 9 made, notice will be given immediately and supplied to the Court and to Defendants.

10 (d) The following exhibits are offered by Defendant:

11 See "**Exhibit C**" of this document.

12 Defendant reserves the right to use any document including but not limited to discovery  
 13 responses and/or deposition testimony by Plaintiff or co-defendants for impeachment and/or  
 14 substantively as party admissions, as may be relevant at trial. Defendant reserves the right to use  
 15 demonstrative evidence. Defendant also reserves the right to use any exhibit listed or introduced by  
 16 Plaintiff or co-defendants, or as previously produced by the parties.

17 (e) **Electronic evidence:**

18 1. The parties may offer Power Point images/drawings/diagrams/animations/story  
 19 boards depicting the facts and circumstance of the accident, information relevant to  
 20 communications between the parties, and/or deposition testimony.

21 2. The parties do intend to present electronic evidence for purposes of bench  
 22 deliberations.

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(f) **Depositions:**

1. Plaintiff will offer the following deposition testimony at trial:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, 21:1-19, 22:18-23:4, 27:22-28:8, 28:24-31:16, 35:20-49:24, 52:16-53:15, 57:14-62:4
Nakia McCloud	12:21-13:14, 27:4-28:16, 32:8-34:11, 34:25-35:23, 39:8-47:20, 48:22-54:22, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 83:17-85:6, 92:13-93:19, 96:9-96:14
Sonalolita Wilson	13:2-13:22, 15:3-15:10, 15:15-16:15, 17:4-17:12, 19:8-19:14, 19:20-22:23, 23:9-26:10, 27:7-29:18, 34:14-35:9, 35:25-38:10, 38:24-40:25, 42:5-54:1, 54:9-60:2, 65:5-66:18, 67:17-69:17, 71:6-75:23, 80:15-82:16, 86:8-88:3, 88:17-89:15, 89:25-90:13, 93:8-96:10, 97:10-101:20, 102:14-103:1, 105:18-106:18, 107:11-109:10, 109:25-111:12, 111:19-112:6, 112:19-119:4, 123:12-125:5, 125:20-135:15, 136:5-138:13
Baduk Ghuman	18:14 – 20:6, 21:9 – 22:22, 27:16 – 28:25, 30:8 – 33:11, 35:1-41:9, 44:9– 49:5, 49:6-50:8, 50:14-55:3, 55:5-56:1, 56:25-58:7, 59:2-60:23, 60:24-64:15, 64:16-67:9, 68:6-71:9, 75:11-76:25, 82:7-84:5, 84:11-88:18, 89:3-91:16, 94:19-96:12, 100:6-103:25, 108:7-110:22, 111:16-112:25, 113:21-115:25
Duff Kaster	15:3-15:22, 21:12-23:11, 24:9-25:1, 25:16-26:13, 26:24-27:12, 28:4-29:24, 32:21-33:23, 34:6-34:16, 35:1-35:18
Robert Hinton	10:4 – 11:15, 12:17 – 13:1, 14:7-15:4, 15:9-16:16, 16:20-17:12, 21:10-23:19, 24:12-25:12, 26:1-30:14, 31:1-32:2, 33:9-40:23
Mark Glyman	11:25-12:21, 14:10-15:1, 19:1-22:4, 22:18-23:16, 24:4-31:16, 33:3-33:20, 34:13-37:13, 37:20-41:16, 41:22-43:9, 44:1-44:23
Thomas Dunn	7:12-9:12, 19:13-20:16, 23:5-24:2, 25:4-25:22, 26:18-31:19, 33:20-35:10, 35:17-39:10, 39:21-44:20, 48:25-50:11, 52:20-55:5, 56:7-57:7, 57:20-60:2, 60:23-61:6, 61:21-62:20, 63:19-66:3, 66:14-67:19
Rick Chavez	10:16-11:6, 20:6-20:18, 22:21-24:22, 25:3-25:14, 29:16-31:21, 41:3-42:19, 45:9-46:1, 47:23-50:5, 51:1-53:9, 59:13-60:21, 63:14-63:25, 64:24-70:10, 71:10-72:24, 73:9-74:14, 75:25-76:17, 77:17-78:12, 79:1-81:14, 82:8-83:2, 84:13-86:9, 87:6-87:24, 94:19-96:9, 102:21-103:19, 106:7-107:10, 108:17-109:18, 110:1-112:2, 114:9-118:17
David John Oliveri	11:24-14:2, 14:14-15:15, 16:25-17:16, 20:1-20:16, 24:4-24:25, 26:2-26:24, 28:3-28:10, 30:3-30:17, 31:14-32:4, 32:17-36:1, 36:7-37:14, 37:22-42:1, 42:15-43:15, 44:2-45:7, 49:7-50:7, 51:8-51:16, 52:19-53:5, 53:18-54:14, 55:19-57:12, 57:21-58:20, 61:3-62:3, 64:14-64:22, 65:11-66:21, 71:8-73:5, 77:6-77:13, 77:19-78:5
Jaswinder Grover	11:23-13:13, 17:6-17:22, 20:5-21:8, 21:21-22:13, 23:1-24:11, 25:2-27:18, 29:18-31:3, 32:3-33:1, 35:18-38:21, 39:2-41:20, 43:2-43:6, 44:16-48:25, 49:1-49:25, 50:8-52:5, 53:3-55:14, 59:5-61:4, 62:10-64:7, 66:2-68:17, 70:4-74:6, 74:23-76:9, 77:7-78:15, 80:3-81:25, 84:11-85:3, 89:4-93:12, 94:6-94:13, 94:14-96:18, 96:21-97:14, 98:3-102:14, 104:7-105:16, 106:6-111:21
Sonalolita Wilson pt.	157:1-164:11, 170:8-180:1, 182:14-183:8, 184:2-185:5, 185:6-186:17,

II	187:18-191:4, 191:15-192:8, 196:23-198:7, 201:8-202:7, 205:1-207:17, 209:24-217:17, 218:22-220:11, 222:1-223:20, 225:3-227:8, 233:14-236:15, 237:14-239:14, 241:7-245:4, 248:3-249:4
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Plaintiff anticipates reading depositions into the records and reserve the right to use all depositions which have been conducted in this action due to witness unavailability, if allowed under FRCP 32(a)(4)(B), to refresh recollection and/or to impeach a witness, as well as any other permitted use under the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

2. Defendant will offer the following deposition testimony at trial:

Deponent	Offered Testimony
Baduk Ghuman	10:24-11:20, 21:1-19, 22:18-23:4, 27:22-28:8, 28:24-31:16, 35:20-49:24, 52:16-53:15, 57:14-62:4
Jaswinder Grover	12:7-9 and 15-20; 13 – 16: 1-3; 17:6 -22; 20:23 – 25; 26:22-25; 27:1-18; 33:2-6; 37:2-12; 41:9-20; 42:9-16; 54:15-25; 55:114; 62:22-25; 63:1-12; 84:9-25; 85:1-3

Defendant USA reserves the right to use all depositions which have been conducted in this action to refresh recollection and/or to impeach a witness, and otherwise use at trial in accordance with the applicable rules, *i.e.*, Fed. R. Civ. P. 32; Fed. R. Evid. 801(d).

**(e) Objections to Depositions:**

(1) Plaintiff objects to Defendant USA's depositions as follows:

Plaintiff objects to the extent that Defendant USA seeks to introduce or use any deposition transcript at trial beyond that allowed under Federal Rules of Civil Procedure and/or the Federal Rules of Evidence. Plaintiff objects to the deposition transcripts of Drs. Ghuman and Grover as hearsay and/or improper impeachment.

(3) Defendant USA objects to plaintiff's depositions as follows:

a. Plaintiff WILSON's depositions: All testimony.

b. David John Oliveri's deposition: All testimony; including, without limitation, to any testimony related to David John Oliveri's life care plan and future medical treatments as struck by the Court. *See* ECF No. 90.

c. To the extent Plaintiff intends to call Defendant USA's expert witnesses and present their



deposition testimony in her case-in-chief, Defendant USA objects to: All Plaintiff's proposed testimony of Defendant USA's expert witnesses; including, without limitation, to Rick Chavez' testimony.

Defendant, USA reserves the right to object to any particular portions of the other deposition transcripts, including, without limitation, those provided by Plaintiff. Furthermore, USA objects to Plaintiff's depositions as noted in subsection (4) below. USA further objects to the extent that either Plaintiff seeks to introduce or use any deposition transcript at trial beyond that allowed under Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

(4) Defendant USA objects to plaintiff's depositions as follows:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, (calls for speculation; incomplete hypothetical; expert opinion) 21:1-19, (relevance; prejudicial) 22:18-23:4, (relevance) 27:22-28:8, (relevance) 28:24-31:16, (relevance; assumption) 35:20-49:24, (relevance; expert opinion) 57:14-62:4 (relevance; expert opinion)
Nakia McCloud	39:8-47:20, (expert opinion) 83:17-85:6, (incomplete hypothetical; calls for speculation; expert opinion) 92:13-93:19, (calls for legal conclusion; expert opinion)
Sonalolita Wilson	13:2-13:22, (relevance, prejudicial, expert opinion) 19:8-19:14, (relevance) 23:9-26:10, (expert opinion) 38:24-40:25, (expert opinion) 42:5-54:1, (relevance, expert opinion) 54:9-60:2, (relevance, expert opinion, best evidence rule) 71:6-75:23, (expert opinion, best evidence rule) 80:15-82:16, (relevance, prejudicial) 86:8-88:3, (relevance, expert opinion, prejudicial, best evidence rule) 88:17-89:15, (relevance, expert opinion, prejudicial, best evidence rule) 89:25-90:13, (relevance, expert opinion, prejudicial, best evidence rule) 93:8-96:10, (relevance, expert opinion, prejudicial, best evidence rule) 102:14-103:1, (relevance, prejudicial, best evidence rule) 105:18-106:18, (relevance, prejudicial) 107:11-109:10, (relevance, prejudicial) 109:25-111:12, (relevance, prejudicial, best evidence rule) 112:19-119:4, (relevance, prejudicial, best evidence rule) 125:20-135:15, (relevance, prejudicial, best evidence rule) 136:5-138:13 (relevance, prejudicial, best evidence rule)
Babuk Ghuman	18:14 – 20:6, (relevance, prejudicial)

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	21:9 – 22:22, (relevance, prejudicial) 27:16 – 28:25, (relevance, prejudicial, best evidence rule) 35:1-41:9, (relevance, prejudicial, best evidence rule) 44:9– 49:5, (relevance, prejudicial, best evidence rule) 50:14-55:3, (relevance, prejudicial, best evidence rule) 55:5-56:1, (relevance, prejudicial, best evidence rule) 56:25-58:7, (relevance, prejudicial, best evidence rule) 59:2-60:23, (relevance, prejudicial, best evidence rule) 60:24-64:15, (relevance, prejudicial, best evidence rule) 64:16-67:9, (relevance, prejudicial, best evidence rule) 68:6-71:9, (relevance, prejudicial, best evidence rule) 75:11-76:25, (relevance, prejudicial, best evidence rule) 82:7-84:5, (relevance, prejudicial, best evidence rule) 84:11-88:18, (relevance, prejudicial, best evidence rule) 89:3-91:16, (relevance, prejudicial, best evidence rule) 94:19-96:12, (relevance, prejudicial, best evidence rule) 100:6-103:25, (relevance, prejudicial, best evidence rule) 108:7-110:22, (relevance, prejudicial, best evidence rule) 111:16-112:25, (relevance, prejudicial, best evidence rule) 113:21-115:25 (relevance, prejudicial, best evidence rule)
Duff Kaster	15:3-15:22, (relevance, prejudicial, best evidence rule) 21:12-23:11, (relevance, prejudicial, best evidence rule) 24:9-25:1, (relevance, prejudicial, best evidence rule) 25:16-26:13, (relevance, prejudicial, best evidence rule) 26:24-27:12, (relevance, prejudicial, best evidence rule) 28:4-29:24, (relevance, prejudicial, best evidence rule) 32:21-33:23, (relevance, prejudicial, best evidence rule) 34:6-34:16, (relevance, prejudicial, best evidence rule) 35:1-35:18(relevance, prejudicial, best evidence rule)
Robert Hinton	21:10-23:19, (relevance, prejudicial, best evidence rule) 24:12-25:12, (relevance, prejudicial, expert opinion, best evidence rule) 26:1-30:14, (relevance, prejudicial, expert opinion, best evidence rule) 31:1-32:2, (relevance, prejudicial, expert opinion, best evidence rule) 33:9-40:23(relevance, prejudicial, expert opinion, best evidence rule)
Mark Glyman	11:25-12:21, (relevance, prejudicial, best evidence rule) 14:10-15:1, (relevance, prejudicial, best evidence rule) 19:1-22:4, (relevance, prejudicial, best evidence rule) 22:18-23:16, (relevance, prejudicial, best evidence rule) 24:4-31:16, (relevance, prejudicial, best evidence rule) 33:3-33:20, (relevance, prejudicial, best evidence rule) 34:13-37:13, (relevance, prejudicial, best evidence rule) 37:20-41:16, (relevance, prejudicial, best evidence rule) 41:22-43:9, (relevance, prejudicial, expert opinion, best evidence rule) 44:1-44:23(relevance, prejudicial, expert opinion, best evidence rule)
Thomas Dunn	25:4-25:22, (relevance, prejudicial, best evidence rule) 26:18-31:19, (relevance, prejudicial, best evidence rule) 33:20-35:10, (relevance, prejudicial, best evidence rule)

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	35:17-39:10, (relevance, prejudicial, best evidence rule) 39:21-44:20, (relevance, prejudicial, best evidence rule) 48:25-50:11, (relevance, prejudicial, best evidence rule) 52:20-55:5, (relevance, prejudicial, best evidence rule) 56:7-57:7, (relevance, prejudicial, best evidence rule) 57:20-60:2, (relevance, prejudicial, best evidence rule) 60:23-61:6, (relevance, prejudicial, best evidence rule) 61:21-62:20, (relevance, prejudicial, best evidence rule) 63:19-66:3, (relevance, prejudicial, best evidence rule) 66:14-67:19(relevance, prejudicial, best evidence rule)
Rick Chavez	10:16-11:6, (relevance, prejudicial, best evidence rule) 20:6-20:18, (relevance, prejudicial, best evidence rule) 22:21-24:22, (relevance, prejudicial, best evidence rule) 25:3-25:14, (relevance, prejudicial, best evidence rule) 29:16-31:21, (relevance, prejudicial, best evidence rule) 41:3-42:19, (relevance, prejudicial, best evidence rule) 45:9-46:1, (relevance, prejudicial, best evidence rule) 47:23-50:5, (relevance, prejudicial, best evidence rule) 51:1-53:9, (relevance, prejudicial, best evidence rule) 59:13-60:21, (relevance, prejudicial, best evidence rule) 63:14-63:25, (relevance, prejudicial, best evidence rule) 64:24-70:10, (relevance, prejudicial, best evidence rule) 71:10-72:24, (relevance, prejudicial, best evidence rule) 73:9-74:14, (relevance, prejudicial, best evidence rule) 75:25-76:17, (relevance, prejudicial, best evidence rule) 77:17-78:12, (relevance, prejudicial, best evidence rule) 79:1-81:14, (relevance, prejudicial, best evidence rule) 82:8-83:2, (relevance, prejudicial, best evidence rule) 84:13-86:9, (relevance, prejudicial, best evidence rule) 87:6-87:24, (relevance, prejudicial, best evidence rule) 94:19-96:9, (relevance, prejudicial, best evidence rule) 102:21-103:19, (relevance, prejudicial, best evidence rule) 106:7-107:10, (relevance, prejudicial, best evidence rule) 108:17-109:18, (relevance, prejudicial, best evidence rule) 110:1-112:2, (relevance, prejudicial, best evidence rule) 114:9-118:17(relevance, prejudicial, best evidence rule)
David John Oliveri	11:24-14:2, (relevance, prejudicial, best evidence rule) 14:14-15:15, (relevance, prejudicial, best evidence rule) 16:25-17:16, (relevance, prejudicial, best evidence rule) 20:1-20:16, (relevance, prejudicial, best evidence rule) 24:4-24:25, (relevance, prejudicial, best evidence rule) 26:2-26:24, (relevance, prejudicial, best evidence rule) 28:3-28:10, (relevance, prejudicial, best evidence rule) 30:3-30:17, (relevance, prejudicial, best evidence rule) 31:14-32:4, (relevance, prejudicial, best evidence rule) 32:17-36:1, (relevance, prejudicial, best evidence rule) 36:7-37:14, (relevance, prejudicial, best evidence rule)

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	37:22-42:1, (relevance, prejudicial, best evidence rule) 42:15-43:15, (relevance, prejudicial, best evidence rule) 44:2-45:7, (relevance, prejudicial, best evidence rule) 49:7-50:7, (relevance, prejudicial, best evidence rule) 51:8-51:16, (relevance, prejudicial, best evidence rule) 52:19-53:5, (relevance, prejudicial, best evidence rule) 53:18-54:14, (relevance, prejudicial, best evidence rule) 55:19-57:12, (relevance, prejudicial, best evidence rule) 57:21-58:20, (relevance, prejudicial, best evidence rule) 61:3-62:3, (relevance, prejudicial, best evidence rule) 64:14-64:22, (relevance, prejudicial, best evidence rule) 65:11-66:21, (relevance, prejudicial, best evidence rule) 71:8-73:5, (relevance, prejudicial, best evidence rule) 77:6-77:13, (relevance, prejudicial, best evidence rule) 77:19-78:5(relevance, prejudicial, best evidence rule)
Jaswinder Grover	11:23-13:13, (relevance, prejudicial, best evidence rule) 17:6-17:22, (relevance, prejudicial, best evidence rule) 20:5-21:8, (relevance, prejudicial, best evidence rule) 21:21-22:13, (relevance, prejudicial, best evidence rule) 23:1-24:11, (relevance, prejudicial, best evidence rule) 25:2-27:18, (relevance, prejudicial, best evidence rule) 29:18-31:3, (relevance, prejudicial, best evidence rule) 32:3-33:1, (relevance, prejudicial, best evidence rule) 35:18-38:21, (relevance, prejudicial, best evidence rule) 39:2-41:20, (relevance, prejudicial, best evidence rule) 43:2-43:6, (relevance, prejudicial, best evidence rule) 44:16-48:25, (relevance, prejudicial, best evidence rule) 49:1-49:25, (relevance, prejudicial, best evidence rule) 50:8-52:5, (relevance, prejudicial, best evidence rule) 53:3-55:14, (relevance, prejudicial, best evidence rule) 59:5-61:4, (relevance, prejudicial, best evidence rule) 62:10-64:7, (relevance, prejudicial, best evidence rule) 66:2-68:17, (relevance, prejudicial, best evidence rule) 70:4-74:6, (relevance, prejudicial, best evidence rule) 74:23-76:9, (relevance, prejudicial, best evidence rule) 77:7-78:15, (relevance, prejudicial, best evidence rule) 80:3-81:25, (relevance, prejudicial, best evidence rule) 84:11-85:3, (relevance, prejudicial, best evidence rule) 89:4-93:12, (relevance, prejudicial, best evidence rule) 94:6-94:13, (relevance, prejudicial, best evidence rule) 94:14-96:18, (relevance, prejudicial, best evidence rule) 96:21-97:14, (relevance, prejudicial, best evidence rule) 8:3-102:14, (relevance, prejudicial, best evidence rule) 104:7-105:16, (relevance, prejudicial, best evidence rule) 106:6-111:21(relevance, prejudicial, best evidence rule)
Sonalolita Wilson pt. II	170:8-180:1, (relevance, prejudicial, expert opinion, best evidence rule) 184:2-185:5, (relevance, prejudicial, expert opinion, best evidence rule)

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1	185:6-186:17, (relevance, prejudicial, expert opinion, best evidence rule)
2	187:18-191:4, (relevance, prejudicial, expert opinion, best evidence rule)
3	191:15-192:8, (relevance, prejudicial, expert opinion, best evidence rule)
4	196:23-198:7, (relevance, prejudicial, expert opinion, best evidence rule)
5	205:1-207:17, (relevance, prejudicial, expert opinion, best evidence rule)
6	209:24-217:17, (relevance, prejudicial, expert opinion, best evidence rule)
7	218:22-220:11, (relevance, prejudicial, expert opinion, best evidence rule)
8	222:1-223:20, (relevance, prejudicial, expert opinion, best evidence rule)
	225:3-227:8, (relevance, prejudicial, expert opinion, best evidence rule)
	233:14-236:15, (relevance, prejudicial, expert opinion, best evidence rule)
	237:14-239:14, (relevance, prejudicial, expert opinion, best evidence rule)
	241:7-245:4, (relevance, prejudicial, expert opinion, best evidence rule)
	248:3-249:4(relevance, prejudicial, expert opinion, best evidence rule)

(5) Plaintiff objects to Defendant USA's depositions as follows:

Deponent	Offered Testimony
Jaswinder Grover	13 – 16: 1-3 (relevance, prejudicial, expert opinion, best evidence rule) 33:2-6 (relevance, prejudicial, expert opinion, best evidence rule) 41:9-20 (relevance, prejudicial, expert opinion, best evidence rule) 42:9-16 (speculation, relevance, prejudicial, expert opinion, best evidence rule) 84:9-25 (speculation, relevance, prejudicial, expert opinion, best evidence rule)
Babuk Ghuman	5:12-15 (relevance) 8:15-22 (relevance) 10:9-13 (relevance, prejudicial) 11:8-12:3 (relevance, prejudicial, best evidence) 12:12-16 (speculation, relevance, prejudicial, best evidence) 17:19-23 (relevance, prejudicial) 22:23-23:10 (relevance, prejudicial, speculation, improper hypothetical, best evidence) 25:23-25 (best evidence) 33:3-11 (relevance, prejudicial) 74:21-75:1 (best evidence) 82:1-3 (speculation, best evidence)

Plaintiff reserves the right to object to any particular portions of the deposition transcripts, including, without limitation, those provided by Defendant USA. Furthermore, Plaintiff objects to the extent that either Defendant USA seeks to introduce or use any deposition transcript at trial beyond that allowed under Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

**VII.**

The following witnesses may be called by the parties at trial:

(a) **Plaintiff intends to call the following witnesses at trial:**

1. Plaintiff, SONALOLITA WILSON  
c/o /o Bradley S. Mainor, Esq.  
Joseph J. Wirth, Esq.  
Ash Marie Blackburn, Esq.  
Joseph W. Guindy, Esq.  
MAINOR WIRTH, LLP  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148  
(702) 464-5000
2. Nakia McCloud  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100,  
(702) 388-6336
3. Witness, Liceth Demha-Santiago  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349  
Las Vegas, NV 89128  
(702) 408-3805
4. Mark Glyman, M.D., DDS, FACS  
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
Mark Glyman, M.D., DDS, FACS / Abby Dental  
1775 Village Center Cir, #150  
Las Vegas, NV, 89113  
(702) 507-5555
5. Thomas Dunn, M.D.  
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
Desert Orthopedic Center  
2800 E. Dessert Inn Rd., Ste 100  
Las Vegas, NV 89121  
(702) 731-1616
6. David Oliveri, M.D.  
851 S. Rampart Dr., # 115,  
Las Vegas, NV 89145  
(702) 778-9300
7. Ira Spector, M.S., C.R.C.  
3440 E. Russell Rd., #208

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Las Vegas, NV 89120,  
 (702) 214-4294

8. Travis Snyder  
 IMGEN  
 4045 S. Buffalo Dr. #A101-363  
 Las Vegas, NV 89147
9. Paul Thomas, Ph.D., MRC, CRC  
 Vocational Economics, Inc.  
 3960 Howard Hughes Parkway, Suite 517  
 Las Vegas, NV 89169  
 (702) 718-1600
10. Samuel Terry  
 Exhibit A  
 P.O. Box 530111  
 Henderson, NV 89053
11. Michael Freeman  
 Med Dr. Ph.D., Forensic Research & Analysis  
 4256 NW 10th Ave. # 306  
 Portland, OR 97209
12. Frank Perez, Ph.D.,  
 4435 N. First St., #205  
 Livermore, CA
13. Robert Lee Hinton  
 98 S. Martin Luther King, Apt. 234  
 Las Vegas, NV 89106  
 (810) 618-1344

14. Plaintiff reserves the right to call any witnesses identified in Defendant's witness list and named during the course of discovery;

15. Plaintiff reserves the right to call rebuttal and/or impeachment witnesses at trial;

16. Plaintiff reserves the right to call any of Defendant's experts as witnesses.

Defendant USA reserves all rights of objections to testimonies at trial including but not limited to any expert opinions that were not timely disclosed in discovery, lack foundation, and/or are not relevant and reliable. *See, e.g.,* Fed. R. Civ. P. 26(a)(2), 37(c)(1), *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) and its progeny. Defendant, USA, also objects to testimony by

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any witness that was not disclosed during the discovery period or whose testimony was already excluded by the Court, including Dr. Oliveri.

**(a) Defendant USA's Witnesses**

1. Nakia McCloud  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100,  
(702) 388-6336
2. Plaintiff, SONALOLITA WILSON  
c/o /o Bradley S. Mainor, Esq.  
Joseph J. Wirth, Esq.  
Ash Marie Blackburn, Esq.  
Joseph W. Guindy, Esq.  
MAINOR WIRTH, LLP  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148  
(702) 464-5000
3. Defendant, Liceth Demha-Santiago  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349  
Las Vegas, NV 89128  
(702) 408-3805
4. Defendant, Juan Demha,  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349,  
Las Vegas, NV 89128,  
(702) 408-3805
6. Rick Chavez, MD  
Pain and Addiction Integrated Network, Inc.,  
4733 Torrance Boulevard, Suite 625  
Torrance, CA, 90506  
(323) 833-8269
7. James G. Lowe, MD, FACS  
Lowe-Greenwood-Zerbo Spinal Associates  
1999 New Road, Suite B  
Linwood, NJ, 08221  
(609) 601-6363
8. Mark Remas, MA, CRC, ABVE  
The Remas Group



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6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148  
Phone: (702) 464-5000 | Fax: (702) 463-4440

7710 Balboa Avenue, Suite 218-H  
San Diego, CA, 92111  
(858) 560-6733

9. Warren M. Torchinsky, DDS  
223 East Main Street  
Maple Shade, NJ, 08052  
(856) 667-7900

10. Eugenia Larmore, PhD, MBA  
550 West Plumb Lane, Suite B459  
Reno, NV 89509  
(775) 232-7203

11. Defendant, USA, reserves the right to call any witnesses identified in Plaintiff's witness list and named during the course of discovery.

12. Defendant reserves the right to call rebuttal and/or impeachment witnesses at trial;

13. Defendant reserves the right to call any of Plaintiff's experts as witnesses.

Plaintiff reserves all rights of objections to testimonies at trial including but not limited to any expert opinions that were not timely disclosed in discovery, lack foundation, and/or are not relevant and reliable. *See, e.g.,* Fed. R. Civ. P. 26(a)(2), 37(c)(1), *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) and its progeny. Plaintiff also objects to the testimony of Eugenia Larmore to the extent that her opinions violate the collateral source rule under *Proctor v. Castelletti*, 911 P.2d 853, 854 n.1 (Nev. 1996). Plaintiff also objects to testimony by any witness whose testimony was already excluded by the Court.

### VIII.

Trial is currently set to begin on July 10, 2023.

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**IX.**

The parties estimate that trial last a total of 5 days.

APPROVED AS TO FORM AND CONTENT:

DATED this 7<sup>th</sup> day of June, 2023.

DATED this 7<sup>th</sup> day of June, 2023.

**MAINOR WIRTH, LLP**

**UNITED STATES ATTORNEY**

/s/ Ash Marie Blackburn  
 BRADLEY S. MAINOR, ESQ.  
 Nevada Bar No. 7434  
 ASH MARIE BLACKBURN, ESQ.  
 Nevada Bar No. 14712  
 6018 S. Fort Apache Road, Ste. 150  
 Las Vegas, NV 89148-5652  
*Counsel for Plaintiff*


/s/ R. Thomas Colonna  
 R. THOMAS COLONNA  
 501 Las Vegas Blvd, South., Ste. 1100  
 Las Vegas, NV 89101  
*Attorney for Defendant United States of America*

**X.**

**ACTION BY THE COURT**

This case is set for bench trial on **July 10, 2023, at 9:00 a.m.** Calendar call will be held on **July 5, 2023, at 1:30 p.m.** This pretrial order has been approved by the parties to this action as evidenced by their signatures or the signatures of their attorneys hereon, and the order is hereby entered and will govern the trial of this case. This order may not be amended except by court order and based upon the parties' agreement or to prevent manifest injustice.

DATED: June 9, 2023.

  
**UNITED STATES DISTRICT JUDGE**

**MAINOR WIRTH, LLP**  
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 Phone: (702) 464-5000 | Fax: (702) 463-4440

**EXHIBIT A****UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ; DOES I  
THROUGH X; AND ROE  
CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Stipulated Exhibits Intended to be  
Admitted**

<b>Exhibit</b>	<b>Description</b>
1.	Manpower Employment File
2.	Plaintiff's Employment Records From Staffmark
3.	TrueBlue Records/ Peopleready Regarding Plaintiff's Earnings
4.	Traffic Accident Report #LVM160901003306
5.	Traffic Accident Report #LVM160901002946
6.	Custodian of Records for 911 recordings and breakdown
7.	911 Recordings
8.	Medical Records and Billing with Custodian of Records for Las Vegas Fire and Rescue for Date of Service September 1, 2016
9.	Medical Records and Billing with Custodian of Records for University Medical Center for Date of Service September 1, 2016
9-A	Films From University Medical Center
10.	Medical Records and Billing for McCourt PLLC a/k/a EMP of Clark UMC for Date of Service September 1, 2016
11.	Medical Records and Billing with Custodian of Records for Desert Radiology Solutions Dates of Service September 1, 2016 Through December 18, 2020
11-A	Films from Desert Radiology Solutions

12.	Medical Records and Billing with Custodian of Records for Nevada Spine Clinic Dates of Service September 8, 2016 Through March 16, 2023
12-A	Films from Nevada Spine Clinic
13.	Medical Records and Billing with Custodian of Records for Better Back Physical Therapy Dates of Service September 9, 2016 Through December 2, 2016
14.	Medical Records and Billing with Custodian of Records for Mark Glyman, M.D. Dates of Service September 13, 2016 Through November 13, 2019
15.	Medical Records and Billing with Custodian of Records for American Radiology Dates of Service September 15, 2016 Through April 26, 2022
16.	Medical Records and Billing with Custodian of Records for Desert Orthopaedics Center Dates of Service September 30, 2016 Through March 15, 2018
16-A	Films for Desert Orthopaedics Center
17.	Medical Records and Billing with Custodian of Records for Pueblo Medical Imaging Date of Service September 30, 2016
17-A	Films from Pueblo Medical Imaging
18.	Medical Records and Billing for Absolute Dental Date of Service October 13, 2016
19.	Medical Records and Billing with Custodian of Records for Desert Anesthesiologist, Inc. Date of Service January 11, 2017
20.	Medical Records and Billing with Custodian of Records for Specialty Surgery Center Date of Service January 11, 2017
21.	Medical Records and Billing with Custodian of Records for Abby Dental/. Dates of Service February 27, 2017 Through March 15, 2017
22.	Medical Records and Billing with Custodian of Records for Smoke Ranch Surgery Center Dates of Service September 3, 2017 Through July 28, 2022
23.	Medical Records and Billing with Custodian of Records for Don Nobis Progressive Physical Therapy Dates of Service December 26, 2017 Through March 23, 2023
24.	Medical Records and Billing with Custodian of Records for Silver State Neurology Dates of Service January 2, 2018 Through February 26, 2018

25.	Medical Records and Billing with Custodian of Records for Louis F. Mortillaro Dates of Service November 14, 2018 Through December 5, 2018
26.	Medical Records and Billing for Lien RX Dates of Service January 4, 2019 Through January 23, 2019
27.	Medical Records and Billing with Custodian of Records for 986 Specialty Pharmacy Dates of Service January 4, 2019 Through June 29, 2021
28.	Medical Records and Billing with Custodian of Records for Smoke Ranch Specialists Dates of Service January 10, 2019 Through May 2, 2019
29.	Medical Records and Billing for CarePro Home Health, Dates of Service January 11, 2019 Through February 11, 2019
30.	Medical Records and Billing with Custodian of Records for Lyons Home Care Dates of Service January 12, 2019 Through February 1, 2019
31.	Medical Records and Billing with Custodian of Records for PayLater Pharmacy Date of Service January 23, 2019
32.	Medical Records and Billing with Custodian of Records for American Medical Response Date of Service May 2, 2019 Through May 20, 2019
33.	Medical Records and Billing with Custodian of Records for Las Vegas Pharmacy Dates of Service March 8, 2019 Through July 1, 2020
34.	Medical Records and Billing with Custodian of Records for Mountain View Hospital Date of Service May 2, 2019
34-A	Films for Mountain View Hospital
35.	Medical Records and Billing with Custodian of Records for Fremont Emergency Services Date of Service May 2, 2019
36.	Medical Records and Billing with Custodian of Records for Mountains Edge Hospital Dates of Service May 3, 2019 Through May 6, 2019
37.	Medical Records and Billing with Custodian of Records for Valley Hospital Medical Center Dates of Service May 8, 2019 Through May 12, 2019
37-A	Films from Valley Hospital Medical Center
38.	Medical Records and Billing with Custodian of Records for Shadow Emergency Physicians Date of Service May 8, 2019 through May 14, 2019

39.	Medical Records and Billing with Custodian of Records for Monitoring Associates Date of Service May 15, 2019
40.	Medical Records and Billing with Custodian of Records for Summerlin Hospital Medical Center Dates of Service May 15, 2019 Through May 20, 2019
40-A	Films from Summerlin Hospital Medical Center
41.	Medical Records and Billing with Custodian of Records for Kindred Hospital Las Vegas- Sahara Campus Dates of Service May 21, 2019 Through August 2, 2019
42.	Medical Records and Billing with Custodian of Records for Next Step Medical Date of Service July 3, 2019
43.	Medical Records and Billing with Custodian of Records for Dental Center of Nevada Date of Service September 16, 2019
44.	Medical Records and Billing with Custodian of Records for Zynex Medical, Inc. Date of Service November 21, 2019
45.	Medical Records and Billing with Custodian of Records for Shiode Psychotherapy, Inc. Dates of Service December 12, 2019 Through March 9, 2020
46.	Medical Records and Billing with Custodian of Records for Radar Medical Group Dates of Service January 16, 2020 Through August 7, 2020
47.	Medical Records and Billing with Custodian of Records for Open Sided MRI Dates of Service February 6, 2020 Through February 7, 2020
47-A	Films from Open Sided MRI
48.	Medical Records and Billing with Custodian of Records for Grand Desert Psychiatric Services Dates of Service March 16, 2020 Through May 14, 2020
49.	Medical Records and Billing with Custodian of Records for Las Vegas Health/ Dr. Hamid Services Dates of Service July 8, 2020 Through August 4, 2020
50.	Medical Records and Billing for Silver State Adult Day Care Dates of Service October 1, 2020 Through November 4, 2021
51.	Medical Records and Billing with Custodian of Records for Prosthetic Center of Excellence Dates of Service May 12, 2021 Through May 20, 2021

52.	Medical Records and Billing with Custodian of Records for Pure Medical Equipment, Inc. Dates of Service February 8, 2022
53.	Medical Records and Billing with Custodian of Records for Quest Diagnostic, Inc. Dates of Service January 28, 2020 Through July 27, 2020
54.	2018 W-4 Completed Form for Sonalolita Wilson

**EXHIBIT A-1****UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;  
LICETH DEMHA-SANTIAGO; JUAN  
DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Stipulated Exhibits Available For Use At  
The Time of Trial But Are Not Currently  
Admitted**

<b>Exhibit</b>	<b>Description</b>
1.	Plaintiff's First Amended Complaint
2.	Defendant United States' Answer to Plaintiff's First Amended Complaint
3.	Google Overhead Photo Depicting the Subject Intersection (1)
4.	Google Overhead Photo Depicting the Subject Intersection (2)
5.	Color Photo Depicting the Scene of the Subject Incident (1)
6.	Color Photo Depicting the Scene of the Subject Incident (2)
7.	Color Photo Depicting the Scene of the Subject Incident (3)
8.	Color Photo Depicting the Scene of the Subject Incident (4)
9.	Color Photo Depicting the Scene of the Subject Incident (5)
10.	Color Photo Depicting the Scene of the Subject Incident (6)
11.	Black and White Photo Depicting Plaintiff's Property Damage (1)
12.	Black and White Photo Depicting Plaintiff's Property Damage (2)
13.	Prior Medical Records and Billing with Custodian of Records for Mountain View Hospital for Date of Service November 9, 2014



14.	Prior Medical Records and Billing with Custodian of Records for University Medical Center for Date of Service January 21, 2014
15.	Prior Medical Records and Billing with Custodian of Records for Valley Hospital for Date of Service February 22, 2016
16.	Life Expectancy Table
17.	Transcripts of Deposition of Babuk Guman, M.D., With Exhibits
	Transcript of Deposition of Rick Chavez, M.D., With Exhibits
18.	Transcript of deposition of Liceth Demha
19.	Transcript of deposition of Mark L. Glyman, M.D., D.D.S., F.A.C.S., with exhibits
	Transcript of deposition of Robert L. Hinton
20.	Transcript of deposition of Duff Kaster, D.D.S., with exhibits
	Transcript of deposition of Nakia McCloud, with exhibits
21.	Transcript of deposition of Sonalolita G. Wilson, with exhibits. Vol 1
22.	Transcript of deposition of Sonalolita G. Wilson, with exhibits Vol 2
23.	Transcript of deposition of David J. Oliveri M.D
24.	Transcript of deposition of Thomas Dunn, M.D
	Transcript of deposition of Jaswinder Grover, M.D
25.	Transcript of deposition of Frank A. Perez, Ph.D
	David Oliveri, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
26.	David Oliveri, M.D. Expert Report dated December 2, 2019
27.	David Oliveri, M.D. Supplemental Expert Report dated August 4, 2020
28.	David Oliveri, M.D. Supplemental Expert Report dated August 4, 2020
29.	David Oliveri, M.D. Supplemental Expert Report dated December 11, 2020
30.	David Oliveri, M.D. Supplemental Expert Report dated April 2, 2021
31.	David Oliveri, M.D. Supplemental Expert Report dated July 26, 2020
32.	David Oliveri, M.D. Supplemental Expert Report dated March 2, 2023

33.	David Oliveri, M.D. Supplemental Expert Report dated March 30, 2023
34.	Ira Spector M.S. C.R.C, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
35.	Ira Spector M.S. C.R.C, Expert Report dated December 12, 2019
36.	Ira Spector M.S. C.R.C, Rebuttal Expert Report dated July 23, 2020
37.	Samuel R. Terry Curriculum Vitae, Testimony List, and Fess Schedule
38.	Samuel R. Terry Expert Report dated June 3, 2020
39.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Curriculum Vitae, Testimony List, and Fess Schedule
40.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Expert Report dated July 8, 2020
41.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Rebuttal Expert Report dated August 5, 2020
42.	Frank Perez, Ph.D Curriculum Vitae, Testimony List
	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
43.	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
44.	Terrence M. Clauretie, Ph.D. Curriculum Vitae, Testimony List, and Fess Schedule
45.	Terrence M. Clauretie, Ph.D. Expert Report dated February 4, 2020
	Thomas Dunn, MD Curriculum Vitae, Testimony List, and Fess Schedule
46.	Thomas Dunn, MD Rebuttal Expert Report dated August 3, 2020
47.	Travis Snyder, D.O. Curriculum Vitae, Testimony List, and Fess Schedule
48.	Travis Snyder, D.O. Rebuttal Expert Report dated August 7, 2020
49.	Dr. James Lowe's Expert Report (dated April 27, 2020)
50.	Dr. James Lowe's Rebuttal Expert Report (dated July 27, 2020)
51.	Dr. James Lowe's Curriculum Vitae, Testimony List, and Fess Schedule
52.	Dr. Rick Chavez's Expert Report (dated July 7, 2020)

53.	Dr. Rick Chavez's Curriculum Vitae, Testimony List, and Fess Schedule
54.	Dr. Warren Torchinsky's Expert Report (dated November 12, 2019)
55.	Dr. Warren Torchinsky's Curriculum Vitae, Testimony List, and Fess Schedule
	Mark Remas's Expert Report (dated April 28, 2020)
56.	Mark Remas's Curriculum Vitae, Testimony List, and Fess Schedule
57.	Eugenia A. Larmore, PhD, MBA's Rebuttal Report Dated March 31, 2023
58.	Eugenia A. Larmore, PhD, MBA's Curriculum Vitae, Testimony List, and Fess Schedule

**EXHIBIT B****UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;  
LICETH DEMHA-SANTIAGO; JUAN  
DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Plaintiff's Exhibits**

<b>Exhibit</b>	<b>Description</b>	<b>Defendant USA's Objections</b>
1.	IRS Incident Report	Privileged; prejudicial; foundation; best evidence
2.	Color Photo Depicting Plaintiff's Property Damage	(No Bates Number Provided) Relevance; foundation; authenticity
3.	Farmers Insurance Exchange Property Damage Estimate of Plaintiff's Vehicle	Relevance; prejudicial; foundation; best evidence; authenticity
4.	Black Box Data for Defendant's Vehicle - GMC Terrain 2014	Prejudicial; foundation; best evidence; authenticity
5.	Vehicle information regarding vehicle driven by Nikia McCloud's	Prejudicial; foundation; best evidence; authenticity
6.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (1)	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
7.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (2)	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
8.	Video of Plaintiff Depicting Full Body Seizure Taken by Robert Hinton	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
9.	Video of Plaintiff Depicting Right Leg Spasm Taken by Robert Hinton	Relevance; prejudicial; foundation; best

		evidence; authenticity; hearsay
10.	Video of Plaintiff Depicting Leg Spasms When Walking Taken by Robert Hinton	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
11.	Video of Plaintiff Depicting Full Body Seizure	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
12.	Video of Plaintiff Depicting Right Leg Spasm	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
13.	Video of Plaintiff Depicting Right Leg Spasm	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
14.	Plaintiff Medical Specials Chart	Relevance; prejudicial; foundation; best evidence; authenticity
15.	Travis Snyder, D.O. Presentation (Plaintiff intends to use portions of Dr. Snyder's presentation as demonstrative exhibit)	
16.	Defendant United State's Responses and Objections to Plaintiff's First Set of Interrogatories	Relevance; prejudicial; Hearsay; best evidence; foundation
17.	Defendant United State's Responses and Objections to Plaintiff's First Set of Requests for Production	Relevance; prejudicial; Hearsay; best evidence; foundation

**EXHIBIT C****UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff

vs.

UNITED STATES OF AMERICA ;  
LICETH DEMHA-SANTIAGO; JUAN  
DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Defendant United States of America's  
Trial Exhibits**

<b>Exhibit</b>	<b>Description</b>	<b>Plaintiff's Objections</b>
577.	Plaintiff's First Supplemental Response to Defendant United States' First Set of Interrogatories (dated November 8, 2019)	Relevance; prejudicial; Hearsay; best evidence; foundation
578.	Plaintiff's Second Supplemental Response to Defendant United States' First Set of Interrogatories (dated January 28, 2021)	Relevance; prejudicial; Hearsay; best evidence; foundation
579.	Plaintiff's Third Supplemental Response to Defendant United States' First Set of Interrogatories (dated February 5, 2021)	Relevance; prejudicial; Hearsay; best evidence; foundation
580.	Plaintiff's Response to Defendant United States' Second Set of Interrogatories (dated November 22, 2019)	Relevance; prejudicial; Hearsay; best evidence; foundation
581.	Plaintiff's Response to Defendant United States' Third Set of Interrogatories (dated March 20, 2020)	Relevance; prejudicial; Hearsay; best evidence; foundation
582.	Plaintiff's Second Supplemental Response to Defendant Demha's First Set of Interrogatories (February 5, 2021)	Relevance; prejudicial; Hearsay; best evidence; foundation
583.	Demha Defendants' Answers to Plaintiff's Interrogatories (dated February 28, 2020)	Relevance; prejudicial; Hearsay; best evidence; foundation